

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
MICHAEL KARRAM, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motions, memorandums and replies filed in relation to Michael Karram for Ethicon Waves 1, 2 and 3, Dkts. 2091, 2446, and 2849 (motions), 2092, 2471, and 2851 (memorandums in support) and Dkts. 2246, 2620 and 3047 (replies); and the reply filed in Ethicon Wave 4, Dkt. 3862 (reply). Plaintiffs respectfully request that the Court exclude Michael Karram's testimony, for the reasons expressed in the Waves 1, 2, 3 and 4 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 13, 2018

Respectfully submitted,

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EXHIBIT A

Choate, Penny	2:14-cv-02954
Gullett, Brenda	2:12-cv-02027
Hau, Carrie A.	2:13-cv-30509
Hochstetler, Diana	2:14-cv-01694
Rich-Maynard, Michelle R.	2:14-cv-05301
Scofield, Bonnie	2:14-cv-05314

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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